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Attorneys for Defendants
7 TRUMP LAS VEGAS CORP; TRUMP
INTERNATIONAL HOTEL & TOWER LAS
8 VEGAS UNIT OWNERS ASSOCIATION;
TRUMP RUFFIN TOWER I, LLC AND
9 TRUMP RUFFIN COMMERCIAL, LLC

10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA, SOUTHERN DIVISION
12

13 AISHA COOKS-PUTNAM, individually,
14

Plaintiff,
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vs.
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17 TRUMP LAS VEGAS CORP., a Nevada
corporation d/b/a Trump International
Hotel & Tower Las Vegas; TRUMP
18 INTERNATIONAL HOTEL & TOWER LAS
VEGAS UNIT OWNERS ASSOCIATION,
19 a Nevada non-profit corporation; TRUMP
RUFFIN TOWER I, LLC, a Delaware LLC
20 d/b/a Trump International Hotel & Tower
Las Vegas; TRUMP RUFFIN
21 COMMERCIAL, LLC a Delaware LLC
d/b/a Trump International Hotel & Tower
22 Las Vegas; OTIS ELEVATOR COMPANY,
a New Jersey corporation; DOES I through
23 XX, inclusive; and ROE BUSINESS
ENTITIES I through XX, inclusive,
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Defendants.
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27
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Case No.

NOTICE OF REMOVAL OF ACTION
(DIVERSITY)

NOTICE OF REMOVAL OF ACTION (DIVERSITY)

COMES NOW, Defendant TRUMP RUFFIN TOWERS I, LLC, erroneously sued herein as TRUMP LAS VEGAS CORP; TRUMP INTERNATIONAL HOTEL & TOWER LAS VEGAS UNIT OWNERS ASSOCIATION and TRUMP RUFFIN COMMERCIAL, LLC (hereinafter referred to as "Defendants"), by and through their counsel of record, Josh Cole Aicklen, Esq., and David B. Avakian Esq., of LEWIS BRISBOIS BISGAARD & SMITH LLP, and hereby removes to this Federal Court the State Court action described below, and in support states as follows:

1. On May 15, 2015, an action was commenced in the Eighth Judicial District Court, Clark County, Nevada, entitled AISHA COOKS-PUTNAM vs. TRUMP LAS VEGAS CORP., et al. Case No. A-15-718473-C (A copy of the Complaint and Summons in this state court action is attached hereto as Exhibit "A.")

2. The Summons and Complaint was served on Defendants by personal service to Defendant's resident agent on May 29, 2015.

3. This notice is filed timely pursuant to 28 U.S.C. section 1446(b). Thirty days have not elapsed since the case became removable.

4. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. section 1332, as there is complete diversity between the parties and I am informed and believe that more than \$75,000 is in controversy, exclusive of interest and costs. Accordingly, pursuant to 28 U.S.C section 1441, Defendant is entitled to remove this action to this court.

5. This case arises out of an alleged elevator incident occurring at Defendant's premises. Plaintiff now seeks money damages, and I am informed and believe that Plaintiff seek to recover in excess of \$75,000, exclusive of interest and costs.

6. Plaintiff is, and during all relevant times was, a resident of the State of the Illinois. Defendant TRUMP RUFFIN TOWER I, LLC is, and was at the time this action commenced, a corporation organized and existing under the laws of the State of Delaware, with its principal place of business in the State of Delaware. Accordingly, there

1 is now, and there was at the time of the commencement of this action, complete diversity
2 between Plaintiff and Defendant. OTIS is and at all relevant times was a corporation
3 organized and existing under the laws of the State of New Jersey.

4 7. The action in the state court was not commenced more than one year
5 before the date of this removal.

6 8. A true and correct copy of this Notice of Removal will be filed with the Clerk
7 for the Eighth Judicial District Court, Clark County, Nevada.

8 9. There are no other known Defendants who did not join in the removal of this
9 action.

10 Based on the foregoing, Defendant removes this action, which is currently pending
11 in the Eighth Judicial District Court, Clark County, Nevada as Case No. A-115-718473-C
12 to Federal Court.

13 DATED this 19th day of June, 2015

14
15 LEWIS BRISBOIS BISGAARD & SMITH LLP

16 By /s/ David B. Avakian
17 JOSH COLE AICKLEN, ESQ.
18 Nevada Bar No. 007254
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25 INTERNATIONAL HOTEL & TOWER LAS
26 VEGAS UNIT OWNERS ASSOCIATION;
27 TRUMP RUFFIN TOWER I, LLC AND
28 TRUMP RUFFIN COMMERCIAL, LLC

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), A.O. 14-2 and N.E.F.C.R. 9, I certify that I am an employee of LEWIS BRISBOIS BISGAARD & SMITH LLP, and that on this 19th day of June, 2015, I did cause a true and correct copy of NOTICE OF REMOVAL OF ACTION (DIVERSITY) to be served by electronic service with the Eighth Judicial District Court Wiznet filing system to the parties on the Electronic Service List addressed as follows:

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By /s/ Susan Kingsbury
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